

**Before the
Federal Communications Commission
Washington, DC 20554**

In the Matter of)	
)	
COLT TELECOM GmbH)	
)	
Application for Authority Pursuant)	File No. _____
to Section 214 of the)	
Communications Act of 1934, as amended,)	
for Global Authority to Operate as)	
an International Facilities-Based Carrier)	
)	

ATTACHMENT 1

A Response to Question 9:

(p) This application qualifies for streamlined processing pursuant to Section 63.12 because none of the foreign affiliates of COLT Telecom GmbH possess market power as that term is defined under Section 63.10(a)(3) of the Commission’s Rules. Furthermore, the Commission has already authorized COLT Telecom U.S. Corp. (“COLT U.S.”) – an entity with exactly the same ultimate ownership as COLT Telecom GmbH – to provide the same applied-for services on the affiliated destination routes. *See In re Overseas Common Carrier Section 214 Applications Actions Taken*, DA 98-527, File No. ITC-98-100 (Mar. 19, 1998).

A Response to Question 10:

COLT Telecom GmbH (“COLT GmbH”) seeks authority to provide switched services over private lines only to countries that appear on the Commission’s list of destinations to which the Commission has authorized the provision of switched services over private lines. To the extent that a country on the foreign end does not appear on this list, COLT Telecom GmbH will

not provide switched services over private lines or will seek a ruling from the Commission pursuant to 47 C.F.R. § 63.18(b).

A Response to Question 11:

(i) Through its parent company, COLT Telecom Group plc., COLT Telecom GmbH is affiliated with foreign carriers in the United Kingdom (COLT Telecommunications), France (COLT Télécommunications France SAS), the Netherlands (COLT Telecom B.V.), Belgium (COLT Telecom NV/SA), Switzerland (COLT Telecom AG), Austria (COLT Telecom Austria GmbH), Italy (COLT Telecom S.p.A.), and Spain (COLT Telecom España SA). COLT Telecom GmbH is itself a carrier in Germany.

(j) COLT Telecom GmbH certifies that it seeks authority to provide international telecommunication services between the U.S. and all international points, including the United Kingdom, France, Germany, the Netherlands, Belgium, Switzerland, Austria, Italy, and Spain.

(k) The United Kingdom, France, Germany, the Netherlands, Belgium, Switzerland, Austria, Italy, and Spain are all Members of the World Trade Organization.

(l)(m) Neither COLT Telecom GmbH nor any of its foreign affiliates exercise market power in any destination market according to the definition of market power provided by Section 63.10(a)(3) of the Commission's Rules.

A Response to Question 12:

(j) COLT Telecom GmbH certifies that it seeks authority to provide international telecommunication services between the U.S. and all international points, including the countries

in which it has a foreign affiliation (U.K., France, Germany, the Netherlands, Belgium, Switzerland, Austria, Italy, and Spain).

A Response to Question 15:

(d) COLT Telecom GmbH has not received authority previously under Section 214 of the Communications Act. Its affiliate, COLT Telecom U.S. Corp. (“COLT U.S.”), has previously received facilities-based and resale authority under Section 214. *See In re Overseas Common Carrier Section 214 Applications Actions Taken*, DA 98-527, File No. ITC-98-100 (Mar. 19, 1998).

(f) At this time, COLT Telecom GmbH also seeks authority to operate international private line (switched resale and individual non-interconnected) services pursuant to Sections 68.16 and 63.18(e)(4).

(g) Not applicable.

Filename: -15823
Directory: C:\Ready_To_Convert\Doc
Template: C:\Program Files\Microsoft Office\Templates\Normal.dot
Title: Before the
Subject:
Author: Stephen Duall
Keywords:
Comments:
Creation Date: 03/27/01 2:44 PM
Change Number: 3
Last Saved On: 03/27/01 3:05 PM
Last Saved By: Stephen Duall
Total Editing Time: 5 Minutes
Last Printed On: 03/28/01 7:07 AM
As of Last Complete Printing
Number of Pages: 3
Number of Words: 518 (approx.)
Number of Characters: 2,954 (approx.)